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signature pages*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**THE TIKTOK DEFENDANTS'
OMNIBUS SEALING STIPULATION
REGARDING PLAINTIFFS' MASTER
COMPLAINT (LOCAL GOVERNMENT
AND SCHOOL DISTRICT)**

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court’s Order Setting Sealing Procedures (Dkt. 341), Defendants TikTok Inc., ByteDance Inc., TikTok Ptd. Ltd., and ByteDance Ltd., (the “TikTok Defendants”) submit this following Omnibus Sealing Stipulation Regarding Plaintiffs’ Master Complaint (Local Government and School District) (“Master Complaint”) (Dkt. 504).

On December 18, 2023, the Local Government and School District Plaintiffs filed their Master Complaint provisionally under seal pursuant to this Court’s Sealing Procedures. The Parties agree that the following portions of the Master Complaint should remain and/or be sealed:

Filing	Paragraphs to Be Sealed	Basis for Sealing
Dkt. 504	Paragraph 816 From after “Hey” until “could you”	The filing contains the names and/or titles of current or former non-party TikTok employees. At this procedural posture, there are compelling reasons to seal those names. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1 (N.D. Cal. Apr. 27, 2012) (granting motion to seal “employee-identifying information” because “[e]mployees and former employees who are not parties to this litigation have privacy interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); <i>see also, e.g., Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors LLC</i> , 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i> , 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont’l Cas. Co.</i> , 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing these names is also consistent with the approach this Court took in sealing names of Meta employees in the Personal Injury Plaintiffs’ Master Complaint. <i>See</i> Dkt. 189.
Dkt. 504	Paragraph 835 From after “Specifically, TikTok’s” until “has acknowledged”	

The Parties agree that the portions of the Master Complaint not listed in the above chart may be unsealed. The TikTok Defendants do not waive, and expressly reserve, their right to move to seal other material from, or derived from, documents quoted, paraphrased, characterized, or otherwise cited in the Master Complaint. The confidentiality or appropriateness of sealing material other than cited portions of the Master Complaint is not currently at issue, and the TikTok Defendants do not waive any right with respect to that material.

Plaintiffs’ agreement to allow portions of the Master Complaint to remain under seal is made in a good faith effort to resolve the current dispute and is not a concession that the agreed redactions

are mandated by law or the arguments TikTok has made. Plaintiffs' agreement extends solely to the copy of the Master Complaint and, as such, does not extend to any underlying documents or information within those documents. Plaintiffs reserve all rights to oppose sealing this same or similar information in the future, as well as to unseal or de-designate the Master Complaint in its entirety in the future.

Pursuant to this case's sealing procedures, the following are attached hereto: (i) a modified copy of the Master Complaint, with the redactions agreed by the Parties listed above; and (ii) a Proposed Order On Undisputed Sealing Requests.

IT IS SO STIPULATED, through Counsel of Record.

DATED: January 19, 2024

Respectfully submitted,

KING & SPALDING LLP

/s/ Geoffrey M. Drake

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ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 19, 2024

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake